

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

ANTHONY PACE	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 4:24-cv-662-SEP
	)	
SYNCHRONY BANK	)	
	)	
Defendant.	)	

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**DEFENDANT SYNCHRONY BANK’S MOTION TO DISMISS**

Defendant Synchrony Bank (“Synchrony”) hereby respectfully moves this Court pursuant to Federal Rule of Civil Procedure 12(b)(6) for an order dismissing Plaintiff’s Complaint in its entirety:

1. Plaintiff’s claims brought under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* and the Telephone Consumer Protect Act, 47 U.S.C. § 227, *et seq.*
2. Each claim fails as a matter of law.
3. Accordingly, and as more fully set forth in the accompanying Memorandum of Law, Plaintiff’s claims against Synchrony should be dismissed.

WHEREFORE, Defendant Synchrony Bank prays for an order dismissing with prejudice Plaintiff’s Complaint and for such other any further relief the Court deems just and proper.

SANDBERG PHOENIX & von GONTARD, P.C.

By: /s/ Zachary S. Merkle  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2024, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system to all counsel of record.

/s/ Zachary S. Merkle